

August 2, 2000

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Dockets Management Branch
HFA-305
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

Re: Docket No. 98F-0165; Irradiation in the Production, Processing and Handling of Eggs

Dear Madam or Sir:

I am writing to urge the Food and Drug Administration to hold a public hearing on the FDA's decision to legalize the irradiation of eggs. The irradiation of eggs is an intervention strategy which fails to address primary causes of Salmonella enteritidis-contaminated eggs. Irradiation falsely implies that eggs are inherently unwholesome products that can only be made "clean" and "safe" by complicated nutrient depleting technologies like irradiation. In reality, (a) hens' eggs have virtually full-proof many-layered barriers against pathogens given that, in nature, hens' eggs are intended to hatch healthy chicks (CDC, 1990; Davis, 1996); and (b) chronically stressed, immunocompromised hens are laying contaminated eggs for human consumption in crowded, filthy buildings and are subjected to a variety of disease-inducing practices including stressful lighting programs and the intentional starvation of the hens known as forced molting. These practices impair hens' immune systems, predisposing them to Salmonella infection. Irradiation masks these primary causes of Salmonella enteritidis (SE) in eggs, and, it has been said, it won't even do that.

Both government and industry point out that irradiation of eggs cannot substitute for sanitation, or for recommended packaging, refrigeration, cooking, and serving of eggs. "Irradiation of fresh shell eggs at the doses requested in the petition will reduce, but not entirely eliminate, microorganisms in eggs," according to the Federal Register, July 21, 2000. Moreover, these microorganisms can grow back from a few to many despite radiation. Notwithstanding, irradiation has been approved as a compensation for poor sanitation and pathogen-promoting economic practices at the farm level and as a compensation for the fact that hens used by the egg industry are pathologically susceptible to infected ovaries and oviducts from a microorganism whose normal habitat is the intestinal tract.

This filthy laying environment includes not only the manure dripping down and encrusting the bars of the wire cages and piling up in the pits beneath the cages. It includes the toxic excretory ammonia gases from the decomposing uric acid in the manure - gases that can range dangerously between 60 and 200 ppm in crowded chicken houses (Davis, 1996). The high levels of ammonia not only permeate egg shells; they predispose the hens to immunosuppression and to airborne pathogens including Salmonella as a result of the excessive mucous that accumulates in the birds' trachea in response to the ammonia overload. Irradiation ignores the disease-producing filth and toxicity in the hens' environment that predispose them and their eggs to Salmonella enteritidis in the first place (Davis, 1996).

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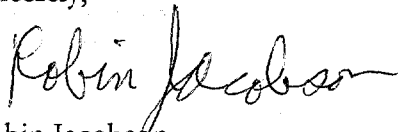
In addition, fifty-two weeks of 15-17-day lighting schedules (mimicking the longest days at the peak of summer) force commercial laying hens to lay an abnormally large number of eggs based on the fact that, in nature, egg-laying is hormonally synchronized with the lengthening and shortening of days North & Bell, 1990). The harsh artificial lighting schedule is a primary cause of immunosuppression in the hens, making them susceptible to Salmonella infection (Smith, 1994). Irradiation does not address this immunosuppressive, pathogen-inducing practice but, rather, encourages it to continue.

Another problem is forced molting. Forced molting is a starvation practice employed by the US egg industry to manipulate egg laying and the economics of production. It involves the removal of ALL food from hens used for commercial egg production for 5 to 14 days (typically 10 to 14 days) to manipulate the hormones responsible for egg production and feather cover. Forced molting is designed to force the birds to lose 25 to 30 percent of their body weight, particularly the abnormal fat which accumulates in their oviducts from lack of exercise and related stresses of confinement (Davis, 1996; United Poultry Concerns, Petition to FDA [Docket No. 98P-0203/CP1], April 14, 1998). And, according to the US Department of Agriculture, "[E]xtended starvation and water deprivation practices lead to increased shedding of Salmonella enteritidis (Se) by laying hens subjected to these practices" (Stolfa, August 21, 1998). USDA further states: There is epidemiologic evidence which associates [forced] molting with higher prevalence of SE in flocks. Molted SE-positive flocks also seem to produce SE-positive eggs more frequently than their non-molted counterparts.

I urge the FDA to hold a public hearing on the agency's decision to legalize the irradiation of eggs. Concern is serious given the fact that irradiation will not reduce the need to treat eggs like Salmonella-contaminated products that can cause acute illness, chronic arthritis, and other systemic degenerative diseases and possibly fatal illnesses in babies, in the growing population of elderly people, and in the large number and diversity of people of all ages with susceptible immune systems (CAST, September 1994).

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in cursive script that reads "Robin Jacobson".

Robin Jacobson
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